

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

JENNIFER VANDERSTOK *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, in his official  
capacity as Attorney General of the United  
States *et al.*,

Defendants.

Case No. 4:22-cv-00691-O

**DEFENDANTS' MOTION FOR EXTENSION OF TIME**

Defendants respectfully move this Court for a one-week extension for the parties to file supplemental briefs, in the event that no motion to supplement the Administrative Record is filed. In support of this motion, Defendants state as follows:

1. The Court has directed that any motions seeking supplementation of the Administrative Record are due on or before November 14, 2022 (ECF No. 105).

2. The Court has ordered the parties to file supplemental briefs on the Court's Rule 65(a)(2) consolidation of Plaintiffs' statutory interpretation claims (ECF No. 107). The Court has directed that such briefs are due either 14 days after the Court resolves any pending motion to supplement the Administrative Record and such supplemental records, where required, are produced; or no later than November 28, 2022, if no such motion is filed (ECF No. 110).

3. The drafting of the parties' supplemental briefs will require coordination and consultation with their clients, but because the week immediately preceding November 28 is Thanksgiving Week, it is likely that there will be widespread absences from office on the part of counsel for all parties, which will frustrate their efforts to consult with their clients.

4. Defendants therefore respectfully request a one-week extension—from November 28 to December 5, 2022—of the deadline for the parties to file their supplemental briefs, in the event that no motion to supplement the Administrative Record is filed.

5. Counsel for Plaintiffs Jennifer VanDerStok; Michael G. Andren; Tactical Machining, LLC; and Firearms Policy Coalition, Inc. (the original plaintiffs) take no position on this motion. Counsel for Plaintiff BlackHawk Manufacturing Group Inc. (intervenor-plaintiff) is not opposed to this motion.

Accordingly, Defendants respectfully request that their motion for extension of time be granted.

DATED: August 26, 2022

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ALEXANDER K. HAAS  
Director, Federal Programs Branch

LESLEY FARBY  
Assistant Director, Federal Programs Branch

/s/ Daniel Riess

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*Attorneys for Defendants*

**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with Plaintiffs' counsel to obtain their position on this motion. Counsel for the original plaintiffs have stated that the original plaintiffs take no position on this motion. Counsel for intervenor-plaintiff have stated that intervenor-plaintiff is not opposed to the relief sought in this motion.

/s/ Daniel Riess

**CERTIFICATE OF SERVICE**

On October 31, 2022, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Daniel Riess